

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

VS.

ZHENG DONG CHENG

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§  
§  
§

NO. 4:20-cr-455

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DEFENDANT'S UNOPPOSED MOTION  
FOR LEAVE TO FILE ADDITIONAL  
PRETRIAL MOTIONS

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TO THE HONORABLE ANDREW HANEN, UNITED STATES DISTRICT JUDGE:

Defendant, ZHENG DONG CHENG moves this Court for permission to file additional and motions as necessary.

**A. Procedural History**

1. The current motion deadline is May 14, 2021. ECF. No. 22.
2. Defendant's *Unopposed Motion for Continuance* was orally granted on May 6, 2021, no new scheduling order has been issued. *See* "Docket Text" for May 6, 2021.
3. Accordingly, Defendant files this motion in an abundance of caution.

**B. Request for Leave to File Motions as Necessary**

4. Defense counsel sent a Rule 16 discovery request to the Government which has, since last fall, provided or made available voluminous discovery. This been described in pleadings and discussed with the Court on several occasions. *See, e.g.*, ECF No. 19 and No. 37.
5. In accordance with the Court's Criminal Procedure 6.H., Defendant will not file any discovery motions until an actual dispute arises.

6. Similarly, review of discovery materials may reveal or substantiate an issue that necessitates a different written motion.

**Prayer**

WHEREFORE, PREMISES CONSIDERED, ZHENG DONG CHENG, Defendant, requests that this motion be granted and he be granted leave to file additional motions as necessary.

Respectfully Submitted,

**HILDER & ASSOCIATES, P.C.**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served upon the Assistant United States Attorney for the government herein, via ECF contemporaneous with filing.

/S/ Q. Tate Williams  
Quentin Tate Williams

**CERTIFICATE OF CONFERENCE**

I hereby certify that on May 14, 2021, I Assistant United States Attorney McIntyre indicated by email the government is unopposed.

/S/ Q. Tate Williams  
Quentin Tate Williams